1 2 3 4 5 6 7 8 9 10 11	Lee Gelernt* Judy Rabinovitz* Anand Balakrishnan* AMERICAN CIVIL LIBERTIES UNION FOUNDATION IMMIGRANTS' RIGHTS PROJECT 125 Broad St., 18th Floor New York, NY 10004 T: (212) 549-2660 F: (212) 549-2654 lgelernt@aclu.org jrabinovitz@aclu.org abalakrishnan@aclu.org  Attorneys for Petitioner-Plaintiff *Admitted Pro Hac Vice	Bardis Vakili (SBN 247783) ACLU FOUNDATION OF SAN DIEGO & IMPERIAL COUNTIES P.O. Box 87131 San Diego, CA 92138-7131 T: (619) 398-4485 F: (619) 232-0036 bvakili@aclusandiego.org  Stephen B. Kang (SBN 292280) Spencer E. Amdur (SBN 320069) AMERICAN CIVIL LIBERTIES UNION FOUNDATION IMMIGRANTS' RIGHTS PROJECT 39 Drumm Street San Francisco, CA 94111 T: (415) 343-1198 F: (415) 395-0950 skang@aclu.org samdur@aclu.org
12	UNITED STATES	S DISTRICT COURT
13	SOUTHERN DISTR	RICT OF CALIFORNIA
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15	Ms. L., et al.,	Case No. 18-cv-00428-DMS-MDD
16	Petitioner- Plaintiff,	
17	V.	Date Filed: August 14, 2019
18	U.S. Immigration and Customs Enforcement ("ICE"), et al.,	
19	,,,,,,,	PLAINTIFFS' NOTICE OF MOTION AND MOTION TO SEAL
20	Respondents- Defendants.	
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1 Plaintiffs respectfully request that the Court permit the filing of restricted 2 exhibits. 3 Plaintiffs seek to seal four exhibits attached to their Supplemental Brief in 4 Support of the Motion for Return of the deported Class Members. These exhibits 5 contain documents concerning the Class Members' immigration proceedings, 6 which Defendants provided pursuant to this Court's order, as well as additional 7 declarations and records regarding asylum proceedings. As such, the exhibits the 8 Class Members' full names, Alien numbers, and other sensitive personal 9 information, as well as those of their children. All the Class Members are asylum 10 seekers who fear persecution in their home countries. 11 In light of the sensitivity of the information contained in these documents, 12 Plaintiffs are filing these exhibits under seal. Plaintiffs will lodge with the Court 13 under seal a full version. 14 Dated: August 14, 2019 Respectfully Submitted, 15 /s/Lee Gelernt 16 Bardis Vakili (SBN 247783) Lee Gelernt\* ACLU FOUNDATION OF SAN Judy Rabinovitz\* 17 DIEGO & IMPERIAL COUNTIES Anand Balakrishnan\* AMERICAN CIVIL LIBERTIES P.O. Box 87131 18 San Diego, CA 92138-7131 UNION FOUNDATION T: (619) 398-4485 IMMIGRANTS' RIGHTS PROJECT 19 F: (619) 232-0036 125 Broad St., 18th Floor bvakili@aclusandiego.org New York, NY 10004 20 T: (212) 549-2660 F: (212) 549-2654 Stephen B. Kang (SBN 2922080) 21 Spencer E. Amdur (SBN 320069) AMERICAN CIVIL LIBERTIES lgelernt@aclu.org jrabinovitz@aclu.org 22 UNION FOUNDATION abalakrishnan@aclu.org IMMIGRANTS' RIGHTS PROJECT 23 39 Drumm Street San Francisco, CA 94111 \*Admitted Pro Hac Vice 24 T: (415) 343-1198 F: (415) 395-0950 25 skang@aclu.org samdur@aclu.org 26 27 28

**CERTIFICATE OF SERVICE** 

I hereby certify that on August 14, 2019, I electronically filed the foregoing with the Clerk for the United States District Court for the Southern District of California by using the appellate CM/ECF system. A true and correct copy of this brief has been served via the Court's CM/ECF system on all counsel of record.

/s/ Lee Gelernt Lee Gelernt, Esq. Dated: August 14, 2019

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